

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARY E. DAVIS, individually and
as Executrix of the Estate of
JEFFREY C. DAVIS, deceased
219 Yorkshire Road
Fairless Hills, PA 19030

Plaintiff,

v.

MOTIVA ENTERPRISES LLC
f/k/a/ Star Enterprise
1100 Louisiana
Houston, TX 77002

Defendant.

CIVIL ACTION

**TRIAL BY JURY OF TWELVE
DEMANDED**

NO. 02-3852

ORDER

THIS _____ day of _____ 2002, upon consideration of the Motion of Motiva Enterprises LLC for Admission Pro Hac Vice of Paul M. Lukoff, Esquire it is hereby ORDERED and DECREED that Paul M. Lukoff, Esquire of Prickett, Jones & Elliott, P.A. is admitted pro hac vice to this Court as co-counsel for Motiva Enterprises LLC in the above-captioned action, and shall be permitted to participate in all phases of the litigation. Howard M. Klein, Esquire and Lauren A. Schochor, Esquire shall serve as associate counsel upon whom all

pleadings, motions and other papers can be served in accordance with the Federal Rules of Civil Procedure and the rules of this Court.

BY THE COURT:

Honorable Mary A. McLaughlin

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MOTION FOR ADMISSION PRO HAC VICE

Defendant Motiva Enterprises LLC, by and through its counsel, Conrad O'Brien Gellman & Rohn, P.C., 1515 Market Street, Sixteenth Floor, Philadelphia, PA 19102, hereby moves this Court to admit pro hac vice Paul M. Lukoff, Esquire of Prickett, Jones & Elliott, P.A., 1310 King Street, Wilmington, DE 19899, as co-counsel for Motiva Enterprises LLC, in the above-captioned action, and in support thereof aver the following:

1. Howard M. Klein, Esquire, of the law firm of Conrad O'Brien Gellman & Rohn, P.C., is a member in good standing of the Bar of the Commonwealth of Pennsylvania and is licensed to practice before this Court and the United States Court of Appeals for the Third Circuit. Mr. Klein has been serving as local counsel for Motiva Enterprises LLC in the above-captioned action.

2. Lauren A. Schochor, Esquire of the law firm of Conrad O'Brien Gellman & Rohn, P.C., is a member in good standing of the Bar of the Commonwealth of Pennsylvania and is licensed to practice before this Court. Ms. Schochor has been serving as local counsel for Motiva Enterprises LLC in the above-captioned action.

3. Paul M. Lukoff, Esquire is a member in good standing of the Bar of the State of Delaware and is licensed to practice before the United States District Court of Delaware and the United States Court of Appeals for the Second Circuit.

4. Paul M. Lukoff, Esquire is not the subject of pending disciplinary proceedings in any jurisdiction.

WHEREFORE, it is respectfully requested that this Court enter an Order admitting Paul M. Lukoff, Esquire pro hac vice on behalf of Motiva Enterprises LLC.

Respectfully submitted,

Howard M. Klein, Esquire
Identification No.: 33632
Lauren A. Schochor, Esquire
Identification No.: 87618
CONRAD O'BRIEN GELLMAN
& ROHN, P.C.
1515 Market Street, Sixteenth Floor
Philadelphia, PA 19102

Attorneys for Defendant
Motiva Enterprises LLC

Dated: August 19, 2002

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AFFIDAVIT OF PAUL M. LUKOFF, ESQUIRE

STATE OF DELAWARE :
 :
COUNTY OF : SS

Paul M. Lukoff, Esquire, being duly sworn according to law, deposes and says:

1. I am an attorney with the law firm of Prickett, Jones & Elliott, P.A.
2. I am a member in good standing of the Bar of the State of Delaware.
3. I am admitted to practice before the state and federal courts of Delaware, and the
United States Court of Appeals for the Second Circuit.
4. No disciplinary proceedings are pending against me in any jurisdiction and no

discipline has previously been imposed on me in any jurisdiction.

5. I have a professional relationship with defendant Motiva Enterprises LLC, and my firm has served as counsel for defendant Motiva Enterprises LLC.

6. I am intimately familiar with the subject matter of this action and have been requested by defendant Motiva Enterprises LLC to represent it in connection with this suit. I respectfully submit that this constitutes good cause to warrant my admission to this Court *pro hac vice*.

7. I submit this Affidavit in support of the Motion for Admission to the Bar of this Court *pro hac vice* and respectfully request that it be granted in its entirety.

Paul M. Lukoff, Esquire

SWORN TO AND SUBSCRIBED
before me this day
of , 2002.

Notary Public

My Commission Expires:

CERTIFICATE OF SERVICE

I, Lauren A. Schochor, hereby certify that on this 19th day of August, 2002 I caused a true and correct copy of the foregoing Motion for Admission Pro Hac Vice to be served via hand delivery upon:

Thomas R. Kline, Esquire
Matthew A. Casey, Esquire
Kline & Specter, P.C.
1525 Locust Street, 19th Floor
Philadelphia, PA 19102

Attorneys for Plaintiff
Mary E. Davis

Lauren A. Schochor